

EXHIBIT 6



September 13, 2019

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Via Fax

Steven S. Biss
300 West Main Street, Suite 103
Charlottesville, VA 22903

Re: *Ed Butowsky v. David Folkenflik, et al.*, Case No. 4:18-cv-00442-ALM, pending in the United States District Court for the Eastern District of Texas, Sherman Division

Dear Steve:

I am writing to follow up on Plaintiff's Objections, Answers and Responses to Defendants' Discovery Requests. I have outlined our specific concerns below.

In response to Request for Production #7, you reference that the materials we are requesting are in the possession of Wigdor and Wheeler and that you will produce the materials after getting them from Wigdor. While we certainly appreciate you providing us with a copy of the materials that you receive from Mr. Wigdor, we also believe that, in the meantime, Plaintiff is under an obligation to produce all responsive documents that are in his possession – like Plaintiff's response to RFP #8 and #9.

In response to Request for Production #13, you indicate that Plaintiff will only produce responsive documents for the time period January 1, 2017 and August 1, 2017. Instruction #8 to Defendants' First Request for Production to Plaintiff already limits the timeframe for the requests to "from July 10, 2016 until the present time." The starting date of July 10, 2016 is significant (and relevant) because it is the date of Seth Rich's death. Given the nature of Plaintiff's claims, communications your client has had with any former or current member of the Trump White House Cabinet or their current or former employees is discoverable and relevant from July 10, 2016 forward in this proceeding. Please modify your response so that it responds to the time period requested and produce the requested materials.

Similarly, in response to Request for Production #21, Plaintiff is refusing to produce any materials concerning his actual or potential on-air appearances on Fox News claiming the request is overbroad as to time frame and subject matter. The same Instruction #8 limiting the time period to July 10, 2016 to the present applies to this request. Furthermore, the subject matter is relevant and not overbroad since, among other things, Plaintiff is contesting his public figure status and Plaintiff is alleged to have been working in concert with Fox News reporter, Malia

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Zimmerman, concerning the retracted Fox News article about Seth Rich. Please modify your response and produce the requested materials.

Finally, in response to Request for Production #29, Plaintiff appears to be refusing to produce his social media posts discussing or referring to the death of Seth Rich. Should the request need to be clarified, Defendants are seeking the posts made by Plaintiff during the time period July 10, 2016 to the present. For obvious reasons, this information is highly relevant and discoverable in this matter. Therefore, we would request that Plaintiff withdraw his objection and produce the responsive materials to this request.

We look forward to hearing from you.

Respectfully yours,



Laura Lee Prather
Partner